

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

PAUL JOSEPH VLASAK

V.

MARIA HALL; ET AL.

PLAINTIFF

CAUSE NO. 3:24-CV-194-DPJ-ASH

DEFENDANTS

MOTION OBJECTING TO VITALCORE HEALTH STRATEGIES MOTION TO QUASH  
PURPORTED SERVICE OF PROCESS AND DISMISS ACTION

COMES NOW, PLAINTIFF PAUL JOSEPH VLASAK, PRASE AND MOVES THIS  
HONORABLE COURT TO DENIE WITH PREJUDICE THE ABOVE STYLED MOTION FILED  
APRIL 18, 2025 IN THIS COURT BY VITALCORE WHO IS BEING REPRESENTED  
BY MICHAEL CHASE, MISSISSIPPI BAR #8622, EMPLOYED WITH THE LAW FIRM OF  
MITCHELL, MCNUTT & SAMS PA, TUPELO, MISSISSIPPI 38802, IN SUPPORT OF  
THIS MOTION PLAINTIFF WOULD SHOW AS FOLLOWS:

- 1.) PLAINTIFF PAUL JOSEPH VLASAK COMMENCED THIS ACTION APRIL 5<sup>TH</sup>, 2024.
- 2.) ON FEBRUARY 18, 2025 THIS HONORABLE COURT ISSUED AN ORDER THAT  
DENIED PLAINTIFF REQUEST OF SERVICE BY UNITED STATES MARSHALL SERVICE FOR SERVING SUMMONS.
- 3.) THE COURT GRANTED PLAINTIFF A 60 DAY EXTENSION OF TIME FROM DATE OF  
ORDER TO SERVE EACH DEFENDANT, I.E. MARIA HALL, GRACIANA HANDY AND  
VITALCORE HEALTH STRATEGIES WITH THE COURT ISSUED SUMMONS AND A COPY OF  
THE CIVIL COMPLAINT AS PROVIDED BY FEDERAL RULES OF CIVIL PROCEDURE, RULE 4.

4.) PLAINTIFF PRO-ACTIVELY REQUESTED LEGAL ASSISTANCE TO HAVE A 3RD PARTY OUTSIDE WITNESS BY REQUESTING PARALEGAL MITZI MAGLEBY TO GO TO POST OFFICE AND PAY FOR CERTIFIED MAIL THEN SHE PLACED IN MAIL THIS CERTIFIED MAIL THAT INCLUDED: THIS COURT ISSUED (SUMMONS WITH PROFF OF SERVICE) AND A (COPY OF THIS CIVIL COMPLAINT FILED APRIL 15<sup>TH</sup> 2025).

THE SUMMONS AND COMPLAINT WAS SENT TO VITAL/CORE, 719 SW VAN BUREN ST., STE. 100, TOPKA, KS. 66603. ALSO SENT SUMMONS AND COMPLAINT TO MARIA HALL, RN, DIRECTOR OF NURSING @ MEDC 2935 HWY 51, CANTON, MS. 39046. AND TO DEFENDANT GRACIELA HAWAY, MEDC SUPERVISOR 2935 HWY 51, CANTON, MS 39046 THIS WAS MAILED ON MARCH 22, 2025.

5.) THE PETITIONER SUBMITS THAT EACH DEFENDANT WAS SERVED WITH SUMMONS AND PROVIDED A COPY OF THIS CIVIL ACTION FILED APRIL 15<sup>TH</sup> 2025.

PLAINTIFF MAGLEBY SUBMITS INTO EVIDENCE A SWORN AFFIDAVIT THAT WAS TRUE AND CORRECT UNDER THE PENALTY OF PERJURY TO THIS HONORABLE COURT, SEE: EXHIBIT "A".

ALSO PLAINTIFF ENTERS INTO EVIDENCE A UNITED STATES POSTAL CERTIFIED MAIL RECEIPT FOR EACH OF THE 3 DEFENDANTS, SEE: EXHIBIT (B).

WHEREFORE PLAINTIFF PAUL JOSEPH VLAST RESPECTFULLY ASK THIS HONORABLE COURT TO DISMISS VITAL/CORE MOTION TO QUASH AND DISMISS ACTION WITH PREJUDICE. PARALEGAL MITZI MAGLEBY HAS 35 YEARS EXP AND HER SWORN AFFIDAVIT WITH THE POSTAL CERTIFIED MAIL RECEIPT. SHE IS WELL AWARE OF THE FEDERAL RULES OF CIVIL PROCEDURE RULE 4, AND RULE 12, AND A COPY OF THIS CIVIL COMPLAINT WAS ATTACHED TO SUMMONS FOR EACH SEPARATE DEFENDANT. PLAINTIFF ASK THIS COURT TO ISSUE A ORDER TO THESE 3 DEFENDANTS WITHIN 21 DAYS THEY MUST ANSWER TO THIS COMPLAINT BY MAILING PLAINTIFF THERE RESIDES IN THE S.A.S.E.

RESPECTFULLY SUBMITTED  
Paul Joseph Vlast  
 Paul Joseph Vlast, PLAINTIFF PRO SE

SWORN AND SUBSCRIBED BEFORE ME  
 20<sup>TH</sup> DAY OF MAY 2025.



[Signature]  
 NOTARY

PRO-SE COUNSEL  
PAUL JOSEPH VLASAK, Plaintiff  
236470 @  
SOUTH MISSISSIPPI CORRECTIONAL FACILITY  
AREA II, B-1-A  
P.O. Box 1419  
LEAKSVILLE, MS. 39451


## CERTIFICATE OF SERVICE.

I CERTIFY THAT ON THIS DATE I SENT BY UNITED STATES 1<sup>ST</sup> CLASS MAIL A REQUEST TO CLERK OF THIS COURT, THE FOREGOING MOTION THAT INCLUDED EXHIBITS A + B, i.e., AFFIDAVIT OF SERVICE BY CERTIFIED MAIL, THE CERTIFIED MAIL RECEIPT, <sup>FROM POST OFFICE</sup> A COPY OF THIS COMPLAINT, FILED ON 04-05-2024 THE FILED STAMP AND SEAL OF EACH SUMMONS REQUESTING CLERK TO FILE STAMP EACH ATTACHED DOCUMENT. SENT BY U.S. 1<sup>ST</sup> CLASS MAIL THE ABOVE TO EACH SEPARATE DEFENDANTS AS FOLLOWS:

- 1.) TO UNITED STATES DISTRICT COURT CLERK, 501 E. COURT ST, STE. 2500, JACKSON, MS. 39201
- 2.) TO MICHAEL CHASE, COUNSEL FOR VITALCORE, P.O. Box 7120, TUPELO, MS. 38802,
- 3.) VITALCORE HEALTH STRATEGIES, 719 SW VAN BUREN ST, STE. 100, TOPEKA, KS. 66603
- 4.) MARIA HALL, RN, DIRECTOR OF NURSING @ MCDC 2935 HWY. 51, CANTON, MS. 39046
- 5.) GRACIENNA HANDY, MCDC SUPERVISOR, 2935 HWY 51, CANTON, MS. 39046

THE ABOVE DOCUMENTS WAS RECORDED WITH (ELAP), INMATE LEGAL ASSISTANCE PROGRAM TO EACH SEPARATE DEFENDANT WHO NOTARIZED AND MAIL THE ABOVE.

THIS 7<sup>TH</sup> DAY OF MAY 2025.

 PRO-SE. 04-07-2025  
PLAINTIFF PAUL JOSEPH VLASAK.